

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

JANE DOE #1, a minor, by her mother and
next friend, JANE DOE #2,

Plaintiff,

v.

MUKWONAGO AREA SCHOOL
DISTRICT and JOE KOCH, in his official
capacity as Superintendent of the Mukwonago
Area School District,

Defendants.

Civ. Action No. 2:23-cv-876

JOINT STATUS REPORT AND MOTION TO EXTEND STAY

Plaintiff and Defendants (collectively, the “Parties”) file this Joint Status Report and Motion to Extend Stay pursuant to this Court’s August 30, 2023, Order, which stayed all proceedings and deadlines in this case for sixty days.

As detailed in Plaintiffs’ Response to Defendants’ Expedited Non-Dispositive Motion to Stay Proceedings Pending Appeal, Dkt. 31, the Parties reached an agreement on an initial two-month stay of all proceedings in the District Court, contingent on Defendants providing certain documents to Plaintiff that are central to this case without formal discovery. Defendants have provided some documents to Plaintiffs, and the Parties are continuing to work constructively together to complete the production. To afford the Parties time to do so, the Parties ask the Court to continue the stay of proceedings for an additional six weeks past its current expiration of October 30, 2023. At the conclusion of that time, if the parties have successfully implemented their agreement regarding document sharing, they anticipate jointly asking the Court to continue

the stay until disposition by the Seventh Circuit of Defendants' appeal of the preliminary injunction.

Dated: October 23, 2023

Respectfully submitted,

/s/ Joel S. Aziere

Joel S. Aziere
jaziere@buelowvetter.com
Corinne T. Duffy
cduffy@buelowvetter.com
Bueow Vetter Buikema Olson & Vliet, LLC
20855 N Watertwon Road, Suite 200
Waukesha, WI 53186
Phone: (262) 364-0300
Fax: (262) 264-0320

Attorneys for Defendants

/s/ Glenn Schlactus

Alexa Milton
Glenn Schlactus
Gemma Donofrio
Emily Curran
Nicholas Abbott
RELMAN COLFAX PLLC
1225 19th Street NW, Suite 600
Washington, DC 20036
Phone: (202) 728-1888
Fax: (202) 728-0848
amilton@remanlaw.com
gschlactus@remanlaw.com
gdonofrio@remanlaw.com
ecurran@remanlaw.com
nabbott@remanlaw.com

Victoria Davis
Robert (Rock) Theine Pledl
DAVIS & PLEDL S.C.
1661 N. Water Street, Suite 410
Milwaukee, WI 53202
Phone: (414) 667-0390
vldd@davisandpled.com
rtp@davisandpled.com

Attorneys for Plaintiff